



Mineral Products Association

The Trade Association for the Aggregates, Asphalt, Cement, Concrete, Dimension Stone, Lime, Mortar and Silica Sand Industries

Sadiq Khan
Mayor of London
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKJ
London
SE1 2AA

By email: londonplan@london.gov.uk

28th February 2018

Dear Mayor

DRAFT LONDON PLAN - COMMENTS BY MINERAL PRODUCTS ASSOCIATION

Please find attached the Mineral Products Association's comments on the New London Plan.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Payne', is positioned above the printed name.

David Payne
Senior Planning Advisor

Policy GG6 Increasing efficiency and resilience

Support and highlight the benefits of masonry construction, in terms of its resilience, durability and lifespan, mass and energy efficiency, and safety, and also the economic benefits of building on existing supply chains, which provide local materials and short lead times, and engaging existing skilled work force.

Policy D1 London's form and characteristics

Support the principles set out in Policy D1. The key attributes of masonry and concrete construction address the needs of development and meet the criteria set out in 3.1.10, as long as they are considered on a site by site, building by building basis to ensure an appropriate whole-life solution. We question support for increased off-site construction and expenditure of public funds to provide land and factories which may stimulate greater use of imported materials rather than indigenous materials and detract from the clear benefits highlighted in comments on Policies GG6, D10 and DD11.

The long-term sustainability benefits of masonry and concrete have already been highlighted, but there is a further point in respect of embodied impacts. Masonry and concrete products are locally produced within the UK, supporting local jobs and industries; an important contributor to the economic component of sustainability, as is the fact that masonry provides the lowest cost method of construction for housing.

Policy D10 Safety, Security and resilience to emergency

Support and highlight the wider resilience benefits of masonry construction, which is also far superior to lightweight construction systems in terms of security.

Policy D11 Fire Safety

Support and highlight the benefits of masonry construction: Since the Great Fire of London, masonry solutions have been recommended to address the risk of fire spread both within buildings, between buildings and to reduce the combustible structural content in our urban environment. Fire safety for occupants of dwellings is covered by the Building Regulations; however, the safety of firefighters, (through knowledge of building's combustible content/properties) has not been addressed. The need to protect a building's structure, so it can be quickly and cost effectively reinstated after a fire (a key insurance issue) has been ignored, as have the potential fire risks evident during construction and pre-completion, which have been highlighted by a series of unfortunate incidents where combustible materials have been used for the structure. Government statistics show that the impacts of fire are greater in buildings of combustible construction¹, even when completed and supposedly compliant with Building Regulations. This point is particularly relevant in multiple-occupant dwellings and buildings for the aged and vulnerable, where fire-resistance

¹ Analysis of fires in buildings of timber framed construction, England, 2009 - 10 to 2011 - 12; Department for Communities and Local Government; December 2012

of the project at completion and throughout its occupation is significantly increased by the use of a non-combustible structure. Whilst recognising that fires occur in all building types and forms of construction, a recent document endorsed by LABC, FPA, ASFB and RISC advises: “*Masonry buildings are by their nature and materials resistant to fire. The designer or specifier should remember that this fundamental quality leads to simpler detailing and construction and this simplicity in turn benefits the thermal and acoustic detailing as well as the construction. Masonry is an excellent material for a ‘fabric first’ approach.*”²

Policy D12 Agent of Change

Support the policy, which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves.

Policy D13 Noise

Support the policy which should be a valuable tool in ensuring that noise sensitive development does not unreasonably constrain or impact on operation of activities including transport, handling and processing of minerals, including rail depots as well as wharves.

Policy SI4 Managing heat risk

Support and advocate the appropriate use of materials that include substantial thermal mass which can be used to reduce the impacts of overheating and save energy both during the winter and the need for air conditioning in the summer time.

Policy SI10 Aggregates

Support the carrying forward of the apportionment for primary aggregates to 4 boroughs (from the existing London Plan), the provision for safeguarding of resources, recycling facilities, and wharves and rail depots. Continuing with the apportionment levels is justified given evidence of construction demand and increasing investment by industry in submitting planning applications within London. Maintaining the apportionment levels recognises that demand is likely to increase over the Plan period, particularly given planned levels of development and provides a positive context for consideration of applications. London currently imports 97% of primary aggregates but indigenous production is an important part of the mix of supply. Support for the requirement to maintain a landbank (as the apportionment) of permitted reserves throughout the Plan period, and recommend that some

² Fire-detailing for non-combustible masonry structures, Building Alliance, 2015

clarification is provided in terms of the overall tonnage that needs to be permitted over the Plan period (ie 0.7 million tonnes per annum x 25 = 17.5mt).

Recommend that policy SI10 (clause D) is extended to also apply the 'Agent of Change' principle to safeguarding of rail depots and other minerals infrastructure (in line with NPPF) that is applied to wharves through Policy SI15. The designing-in of mitigation to 'agent of change' development at an early stage (particularly to reduce noise impacts) is equally important for rail depots as wharves.

Recommend that Clause D should also not solely relate to the 'environmental impact of aggregates' but also to '*ensure the steady, adequate and sustainable supply*' (to properly reflect the purpose of the policy in enabling a 'reliable supply of construction materials referred to in para 9.10.1), and the safeguarding will be achieved in part through application of the Agent of Change principle.

Policy SI15 Water Transport

Support the encouragement of greater use of the river for freight transport, and to enable this, the safeguarding of wharves and wharf capacity from other types of development, and increased use/re-activation. Support the 'Agent of Change' principle, that development adjacent to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance (clauses G & H). This will be essential to ensure that potentially conflicting uses can co-exist, and has already been demonstrated at some developments within the Greenwich Millennium Village but less successfully elsewhere. The 'Agent of Change' principle also needs to apply to rail depots and other infrastructure as well as to wharves, as recommended in our comments on Policy SI10.

Policy T7 Freight and Servicing

Support the safeguarding wharves and railheads involved in distribution of aggregates (clause C) [the policy should refer to Policy SI15 rather than SI5].

Policy E4 Land for industry, logistics and services to support London's economic function

Support 'no net loss' of industrial land and recommend that in addition to the provision for secondary materials and waste management (clause 3) Policy E4 also includes specific provision for '*minerals importation and processing/manufacturing*' capacity eg asphalt plants, concrete batching plants, at suitable industrial sites, reflecting the acknowledgement in para 9.10.5 that such sites may be particularly appropriate for 'depots' (taken as meaning a range of minerals operations - but the definition should be clarified).